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SBC

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Ex Parte

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S. W.
Room TWB-204
Washington, DC 20554

RE: *Petition of SBC Communications Inc. for Forbearance from the Prohibition of Sharing Operating, Installation and Maintenance Functions Under Section 53.203(a) (2) of and 53.203(a)(3) the Commissions Rules and Modification of Operating, Installation and Maintenance Conditions Contained in the SBC/Ameritech Merger Order, CC Docket No. 96-149 and 98-141*

Dear Ms. Dortch:

In response to the questions raised by the Wireline Competition Bureau staff, SBC is providing the attached. Please let me know if you have any questions.

Sincerely,

Jacquelyne Flemming

Attachment

cc: Michelle Carey (FCC- Wireline Competition Bureau)
    William Dever (FCC- Wireline Competition Bureau)
    Pamela Megna (FCC- Wireline Competition Bureau)
    Christi Shewman (FCC- Wireline Competition Bureau)
    Robert Tanner (FCC- Wireline Competition Bureau)

Provisioning of Access Services – Pre and Post OI&M Relief

OI&M relief will not change the manner in which the BOC processes orders. Today, orders from all carriers – affiliates and non-affiliates – are processed using the systems and processes described below. After OI&M relief, the BOC will continue to process orders in the same manner. .

1. Provisioning Process Flows

As discussed in SBC's brief at pages 12-13, SBC's installation and provisioning processes are substantially automated. Over the years, SBC has been constantly refining and updating its systems to increase the mechanical handling of orders, thereby reducing the amount of manual work needed for circuit design, assignment, and testing of installation facilities. As a result of these improvements over 80% of the orders flow through the installation and provisioning systems (LFACS, TIRKS, and SWITCH) without any manual intervention today.[1]

Attached is a diagram that illustrates the process flows and systems involved in the installation and provisioning of network facilities. Also, listed below, are some of the significant improvements that SBC has made to increase the flow through of the orders to these systems.

2. Installation Systems

LFACS (Loop Facilities Assignment Control System). This system assigns the outside plant network facilities necessary for the particular service order (for e.g., for an order requiring high capacity data transfer service, LFACS would assign a DS1-capable loop). SBC has implemented a new testing tool (MYNAH) for LFACS that essentially tests for whether orders will flow through the system without manual intervention. As a result, SBC has been able to make changes to LFACS to ensure that most orders that are based on standard formatting flow through the system, thereby reducing the fallout rate for LFACS orders.

Additionally, for remaining orders that continue to fallout from the system despite the above improvements, SBC has implemented mechanized "scripts." These "scripts" correct errors on orders without any manual intervention, thus improving even further the mechanized handling of orders in LFACS.

TIRKS (Trunk Integrated Records Keeping System): This system performs the inventory control and assignment function for designed services and determines if there are facilities and equipment available to meet the customer's request. SBC has been constantly updating the service order flow to TIRKS so that many orders that used to fall out for manual handling due to design specifications, now flow through the system and are designed automatically.

To improve the flow through of orders in TIRKS, SBC has implemented two mechanized scripting tools. First, it has implemented scripts in the "mainframe" system, i.e., it has

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[1] Most work on orders that require manual intervention is performed on a first-come first-serve basis by technicians who are blind to the identity of the customer. Therefore, even on those orders, there is little chance of discriminatory treatment.

implemented programs on the main computer that runs TIRKS so that orders that previously fell out of TIRKS now flow through the system. Second, for orders that continue to fall out of the system despite the mainframe scripts, SBC has implemented "mechanized circuit provisioning," i.e., scripts that emulate an employee resolving the error. These scripts automatically correct some errors in the computer without requiring manual handling.

3. Other Provisioning Systems

Once the facilities needed to provision an order are assigned by the various systems, the order is sent to a central office technician to complete the central office work necessary to turn up a circuit and test it. In recent years SBC has introduced a system known as the FCD (Frame Continuity Date) Manager for the mechanized monitoring and testing of circuit continuity after the central office work has been completed. SBC uses this system to test DS1 and DDS (Digital Data Service) circuits wherever technically feasible. As a result, many of the DS1 and DDS circuits that were once manually tested, are now tested mechanically.

Additionally, SBC has developed a tool (HANSEL) for the trouble isolation and repair of the above circuits. This tool monitors circuits for up to 30 days after they have been provisioned to detect troubles. If it detects troubles, it initiates mechanized trouble reports, thereby eliminating the need for manual reporting. This tool is blind to the identity of the customer; circuits are tested and trouble reports initiated simply in order of the provisioning or trouble detection.[2]

Thus, given the substantial mechanization of the installation and provisioning systems today, there is little room for SBC to discriminate against its competitors. As a result of these changes, an increasing number of orders the used to fall out for manual handling, now flow through the system and are designed automatically.

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[2] SBC has also developed a mechanized process to test troubles after receiving a trouble report. Wherever technically feasible, testing is now completed automatically on a first in first out basis, thus leaving little room for discretion in the prioritization of maintenance work.